

*SC NAACP v. Alexander,*  
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

# EXHIBIT 5

30(b)(6) President Brenda C. Murphy  
The South Carolina State Confvs.McMaster/Alexander

August 8, 2022

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE DISTRICT OF SOUTH CAROLINA  
3                   COLUMBIA DIVISION  
4                   THE SOUTH CAROLINA STATE  
5                   CONFERENCE OF THE NAACP

6                   and

7                   TAIWAN SCOTT, ON BEHALF OF HIMSELF  
8                   AND ALL OTHER SIMILARLY SITUATED  
9                   PERSONS,

10                  Plaintiffs,

11                  vs.

12                  Case No. 3:21-CV-03302-MGL-TJH-RMG

13                  THOMAS C. ALEXANDER, IN HIS OFFICIAL  
14                  CAPACITY AS PRESIDENT OF THE SENATE;  
15                  LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY  
16                  AS CHAIRMAN OF THE SENATE JUDICIARY  
17                  COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL  
18                  CAPACITY AS SPEAKER OF THE HOUSE OF  
19                  REPRESENTATIVES; CHRIS MURPHY, IN HIS  
20                  OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE  
21                  OF REPRESENTATIVES JUDICIARY COMMITTEE;  
22                  WALLACE H. JORDAN, IN HIS OFFICIAL CAPACITY  
23                  AS CHAIRMAN OF THE HOUSE OF REPRESENTATIVES  
24                  ELECTIONS LAW SUBCOMMITTEE; HOWARD KNAPP,  
25                  IN HIS OFFICIAL CAPACITY AS INTERIM  
                  EXECUTIVE DIRECTOR OF THE SOUTH CAROLINA  
                  STATE ELECTION COMMISSION; JOHN WELLS,  
                  JOANNE DAY, CLIFFORD J. EDLER, LINDA MCCALL,  
                  AND SCOTT MOSELEY, IN THEIR OFFICIAL  
                  CAPACITIES AS MEMBERS OF THE SOUTH CAROLINA  
                  STATE ELECTION COMMISSION,

                  Defendants.

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21       DEPOSITION OF:     THE SOUTH CAROLINA STATE CONFERENCE  
22                               OF THE NAACP  
23                               BY:   PRESIDENT BRENDA C. MURPHY  
24                               (Via Videoconference)  
25       DATE:               Monday, August 8, 2022  
          TIME:             1:22 p.m.

1 MR. TYSON: Sure. We will be back in  
2 five minutes.

3 THE WITNESS: Okay.  
4 (Break In Proceedings)

5 MR. INGRAM: Rob, I just want to state  
6 for the record that we preserve any objections for  
7 topics that are outside of the scope of the noticed  
8 30(b)(6) subjects.

9 MR. TYSON: Thank you.

10 BY MR. TYSON:

11 Q. All right. Ms. Murphy, I think when we  
12 left off we were going through a bunch of emails  
13 talking about how the State Conference was getting  
14 prepared and training and participating in the  
15 process. One of the questions that I had was -- and  
16 I think you answered it earlier, but the State  
17 Conference -- or the NAACP did provide a draft map  
18 to the Legislature for a Congressional plan.  
19 Correct?

20 A. Yes.

21 Q. And do you recall getting any feedback  
22 about that proposed plan?

23 A. No.

24 Q. How was the map drawn? Or let me step  
25 back. That was a poor question. Excuse me. What

1 were the criteria -- how did you come up with a  
2 certain plan on how to draw the seven Congressional  
3 districts?

4 A. As I mentioned, you know, we worked with  
5 other resources. ACLU had demographers. You know,  
6 we looked at what we thought might be good. And,  
7 you know, the demographer and the statisticians  
8 looked at the data to help us, you know, make  
9 decisions that were based on the criteria and if  
10 there were maybe -- you know, it was a joint effort,  
11 I guess that's what I should say, in terms of us  
12 working together, of sharing our ideas, our  
13 thoughts, looking at what we thought were  
14 challenges, and they came up -- the demographers  
15 came up with a map which we reviewed and we agreed  
16 upon.

17 Q. You said you looked at the criteria. It  
18 was based on criteria?

19 A. I said the demographers, the  
20 statisticians, they all helped us to make sure that  
21 when the map drawing was being done that we were  
22 looking at it in an objective way that we were  
23 meeting criteria that needed to be met.

24 So bottom line is, rephrasing it, they  
25 kept us focused, in order for us not to be maybe

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2 30(b)(6) President Brenda C. Murphy (#5340046)

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24 30(b)(6) President Brenda C. Murphy

Date

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ACKNOWLEDGEMENT OF DEPONENT

I, 30(b)(6) President Brenda C. Murphy, do hereby declare that I  
have read the foregoing transcript, I have made any  
corrections, additions, or changes I deemed necessary as  
noted above to be appended hereto, and that the same is  
a true, correct and complete transcript of the testimony  
given by me.

\_\_\_\_\_  
30(b)(6) President Brenda C. Murphy

Date

\*If notary is required

SUBSCRIBED AND SWORN TO BEFORE ME THIS

\_\_\_\_\_ DAY OF \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
NOTARY PUBLIC